

## Civil Enforcement Case Report

### Civil Enforcement Case

#### Basic Information

**Case Number:** 07-2015-0370  
**Case Name:** CARGILL INCORPORATED  
**Case Category:** Administrative - Formal  
**Case Status (as of 08/16/2016):** Closed  
**Case Lead:** EPA  
**Court Docket Number:** CAA-07-2015-0030  
**DOJ Docket Number:** --

**Relief Sought:** Penalty  
**Enforcement Outcome:** Final Order With Penalty  
**Headquarters Division:** --  
**Branch:** --  
**Result of Voluntary Disclosure?** No  
**Multi-media Case?** --  
**Enforcement Type:** CAA 113D1 Action For Penalty  
**Violations:** General Facility Requirements

#### Penalties – Case Level

**Total Federal Penalty Assessed or Agreed To:** \$110,000  
**Total State/Local Penalty Assessed:** \$0  
**Total SEP Cost:** \$155,000  
**Total Compliance Action Cost:** \$60,000  
**Total Cost Recovery:** \$0

#### Case Summary

CARGILL FAILED TO COMPLY WITH SPECIFIC REQUIREMENTS OF THE PHARMACEUTICAL MACT INCLUDING FAILURE TO PROPERLY MONITOR EQUIPMENT SUBJECT TO LEAK DETECTION AND REPAIR REQUIREMENTS AND FAILURE TO IDENTIFY WASTEWATER AT THE FACILITY SUBJECT TO THE EMISSION CONTROL REQUIREMENTS. AS PART OF THE SETTLEMENT, CARGILL WILL IMPLEMENT AN ADVANCED LEAK DETECTION PROGRAM AND CONDUCT A SEP THAT WILL REPLACE CERTAIN PUMPS AT THE FACILITY WITH SEALLESS PUMPS.

#### Laws and Sections

Law	Sections	Programs
CAA	112D	MACT Standards

#### Citations

Title	Part	Section
No data records returned		

#### Facilities

FRS Number	Facility Name	Address	City Name	State	Zip	SIC Codes	NAIC Codes
110017436130	CARGILL INC	1 CARGILL DR	EDDYVILLE	IA	52553	2046 2087 4953	311221

#### Defendants

#### Case Milestones

Defendants and Settlements	In Complaint	In Settlement
CARGILL, INCORPORATED	Y	Y

## Related Case Documents

Document	Facility Name	Publish Date	EPA Program
No data records returned			

Event	Actual Date
Final Order Issued	09/09/2015
Complaint Filed/Proposed Order	09/09/2015
Enforcement Action Data Entered	09/11/2015
Pipeline Closed	08/16/2016
Enforcement Action Closed	08/16/2016

## Pollutants

Pollutant Name	Chemical Abstract Number
No data records returned	

## Related Activities

Description	Actual Date
No data records returned	

## Final Order 1

**Final Order Type:** Administrative Penalty Order With or Without Injunctive Relief

**Final Order Name:** CARGILL INCORPORATED

**Linked Facilities (FRS ID):** 110017436130

**Final Order Lodged Date:** --

**Final Order Entered Date:** 09/09/2015

**Enforcement Action Closed Date:** 08/16/2016

**Actual Termination Date:** 08/16/2016

## Penalties/SEPs/Cost Recovery Amounts

**Federal Penalty Assessed or Agreed To:** \$110,000

**State/Local Penalty Assessed:** --

**SEP Value:** \$155,000

**Compliance Action Cost:** \$60,000

**Federal Cost Recovery Awarded:** \$0

## Complying Actions

Complying Action ID	Category	Description
3600012370	Reduction of Ongoing Releases	Leak Repair (LDAR)
3600012371	Reduction of Ongoing Releases	Industrial Process Change

## Supplemental Environmental Projects

SEP ID	Category	SEP Value	Description
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SEP ID	Category	SEP Value	Description
3600002045	Pollution Prevention/Equipment-Technology Modification	\$155,000	CARGILL WILL SPEND AT LEAST \$155,000 TO IMPLEMENT A SEP INCORPORATING SEALLESS PUMP TECHNOLOGY AT ITS FACILITY. CARGILL WILL REPLACE CERTAIN MECHANICAL SEAL PUMPS AT THE FACILITY THAT HAVE THE POTENTIAL TO LEAK HAPs AND OR VOCs, WITH EQUIPMENT THAT IS DESIGNED NOT TO LEAK, AND WILL COMPLETE THE SEP WITHIN ONE YEAR OF THE FILING OF THE CONSENT AGREEMENT AND FINAL ORDER.

**Pollutant Reductions**

Resulting From	Pollutant	Annual Amount	Units	Media Affected
CA ID 3600012370	VOC	3,243	lbs	Air
CA ID 3600012371	VOC	9,431	lbs	Air